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Route To: *

Subject: Proposed Action for Using Naturally Occurring and Management Ignited Fire on the Coconino National Forest

To: Ed Paul, ID Team Leader

Thanks for the opportunity to review the draft proposed action. The following are my comments on the document.

Purpose and Need section (page 2), I was curious why the mixed conifer vegetative type was listed as a fire intolerant vegetative type. Swetnam (Swetnam, T. Fire History and Climate in the southwestern United States. pp 6-17 IN: Krammes, J.S. tech. coord. 1990. Effects of Fire Management of Southwestern natural Resources. Gen. Tech. Rep. RM-191. Fort Collins, CO: USDA Forest Service, Rocky Mountain Forest and Range Experiment Station) reports that fire return intervals for several mixed conifer sites around the region between 1700 and 1900 averaged between 6 to 10 years. I haven't seen any reports for mixed conifer on the Coconino though but these other sites seem very consistent with one another. I also wondered what the definition of the mixed conifer type was for this document, does it include the spruce-fir type also? I would expect spruce-fir to have a much longer fire return intervals deviate the least from pre-settlement conditions.

Current and Desired Conditions, page 5. I disagree with the statement that within the mixed conifer type that fire frequencies, fuel accumulations and vegetative conditions are within expected parameters. What is expected? Are we comparing to presettlement conditions or some other reference condition? If so, the historic photo record on the peaks suggests that vegetative conditions have changed greatly, meadows are filling in and overstory canopies have closed. Marlin Johnson (Johnson, M.A. 1995. Changes in southwestern Forests: Stewardship Implications. USDA Forest Service Southwestern Region, 6 pp) reported that between 1962 and 1986, the mixed conifer forest type has increased by 1,040,000 or 81 percent within the region. Evidence from dendrochronology studies, such as those described in the last paragraph suggest that fire return intervals were relatively short in many areas in the mixed conifer type, however now I suspect they are much longer. Others have noted that the stand structures within the mixed conifer type have shifted to a more multistoried condition and that species composition has shifted favoring shade intolerant species such as white fir (Swetnam, T.W. and A.M. Lynch, 1993. Multicentury, Regional-Scale Patterns of Western Spruce budworm Outbreaks. Ecological Monographs, vol 63, no. 4 pp399-424). I think there have been fairly dramatic shifts in fire frequency and vegetative conditions within the mixed conifer type. These changes in turn have affected the susceptibility of mixed conifer forests to other disturbance agents such as insects and diseases.

Current Conditions, page 6. I would suggest using a different word for "mature" or "overmature" to describe old aspen trees. The terms mature or overmature imply a timber or commodity bias and I think some readers will pick up on this. Same comment goes for the description of shrub vegetation in the next paragraph. When describing conditions we should describe them but not

immediately apply value judgements. We should also objectively discuss the implications of those conditions.

Under issues, I wondered how noxious weeds would be dealt with in the plan. Many of these plants favor disturbed sites, what will we do to decrease the opportunity for spread? Of course without management ignited fire, catastrophic fires will provide large areas for noxious weeds to expand into. It would seem that if we ignite fires ourselves we give ourselves the opportunity to prepare ahead of time.

If you have any questions, feel free to give me a call at 520-556-2074 or via email at jwilson/r3,coconino.

/s/ Jill L Wilson

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